## SUSMAN GODFREY L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

I 900 AVENUE OF THE STARS
SUITE I 400

LOS ANGELES, CALIFORNIA 90067
(310) 789-3100

FAX (310) 789-3150

WWW.SUSMANGODFREY.COM

SUITE 5 I 00 I 000 LOUISIANA STREET HOUSTON, TX 77002-5096 (7 I 3) 65 I -9366

SUITE 3000 40 | UNION STREET SEATTLE, WASHINGTON 98 | 0 | -2683 (206) 5 | 6-3880

ONE MANHATTAN WEST NEW YORK, NEW YORK 10001-8602 (212) 336-8330

BILL CARMODY
DIRECT DIAL (2 | 2) 336-8334

E-MAIL BCARMODY@SUSMANGODFREY.COM

January 21, 2025

## VIA ECF

The Honorable Naomi Reice Buchwald United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: In re LIBOR-Based Financial Instruments Antitrust Litigation

Case No. 11-md-2262

## Dear Judge Buchwald:

Pursuant to Section 2.H.2 of Your Honor's Individual Practices, Section 6 of the Electronic Case Filing Rules & Instructions, and Your Honor's September 27, 2024 Order (ECF No. 4136), I write to respectfully request permission to file underseal OTC Plaintiffs' memorandum of law, declaration, and exhibits submitted in opposition to Bank of America and JPMorgan's Motion to Decertify the OTC Class and in further support of Plaintiffs' Motion to Certify Class as to Credit Suisse, RBS, and UBS. (ECF Nos. 4317, 4182.)

These filings include materials that have been designated as Confidential or Highly Confidential pursuant to the Amended Stipulation and Protective Order dated May 12, 2016 (ECF No. 1405). Consistent with Your Honor's September 27, 2024, Order (ECF No. 4136), by February 4, 2025, OTC Plaintiffs will file a public set of all materials submitted in connection with these motions.

<sup>1</sup> Mayor and City Council of Baltimore, City of New Britain, Jennie Stuart Medical Center, Inc., Vistra Energy Corp., and Yale University.

January 21, 2025 Page 2

Plaintiffs are delivering courtesy copies of the sealed filings to Chambers in accordance with Section 2.H.2 of Your Honor's Individual Practices and are also serving the sealed filings on liaison counsel for Defendants via email.

Application granted. So ordered.

Respectfully Submitted,

/s/ William Christopher Carmody
William Christopher Carmody
SUSMAN GODFREY L.L.P.

NAOMI REIGE BUCHWALD
UNITED STATES DISTRICT JUDGE
Dated: January 22, 2025

New York, New York

Co-Lead Counsel for OTC Plaintiffs and Liaison Counsel for Class Plaintiffs

Cc: All counsel via ECF